



United States Environmental Protection Agency
Region 10 Emergency Response Unit
POLLUTION REPORT

I. HEADING

Date: February 7, 2000
Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington
From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit
Tel: Office (206) 553-0279
TO: See Distribution List on last page

POLREP No.8 (Progress)

II. BACKGROUND

Site ID: SSID # 106W
Delivery Order No: 081-10 -02
Response Authority: CERCLA,
CERCLIS No: WASFN1002182
NPL Status: Not Listed (former RCRA site within Commencement Bay Superfund site)
State Notification: Washington State Department of Ecology referred site to EPA
Action Memo Status: Signed on December 17, 1999 and January 7, 2000
Removal Start Date: December 17, 1999
Expected Completion Date: March 17, 2001
Site Web Page: www.epa.gov/r10earth, click Index, click C for CleanCare. or use URL: <http://epainotes1.rtpnc.epa.gov:7777/r10/cleanup.nsf/sites/CleanCare>

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47° 16' 25" North and longitude 122° 23' 32" West. The site is located in the Tacoma Tideflats area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (tank farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS 4-B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

January 31, 2000 (Monday)

Personnel on site: 4 START, 11 ERRS, 3 Coast Guard, 1 EPA
Weather: Cool, in the 30s warming to the 40s, overcast with drizzle
All site personnel attended daily safety meeting and discussed site safety and planned activities. START established a contract for temporary employees starting tomorrow, and sampled Tanks T-4 and T-5, ERRS dumped 150-160 oil filter drums, moved and segregated 2.5 trailers of RCRA drums, managed surface water, and removed one rolloff of used oil filters from the site. EPA civil investigator began investigation and started to identify and copy manifests associated with drums to be retrieved by the major generators.

February 1, 2000 (Tuesday)

Personnel on site: 4 START, 11 ERRS, 3 USCG, 1 EPA, 4 Temps (working inside Office Building 1)
Weather: overcast, intermittent rain, windy, high 45 F
All site personnel attended daily safety meeting and discussed site safety and planned activities. START sampled tank T-3 (completing Tank Farm 1 sampling), reviewed data for Baker Tank #16 prior to transport by Emerald Petroleum Services (19,300

gallons), provided heat, lights and file boxes for temporary employees, and started to inventory RCRA drums. ERRS started setting up the temporary waste water treatment system, continued ordering components for the waste water treatment system, continued managing the site surface water, added absorbent pads to Lincoln Ave ditch as needed, dumped 86 oil filter drums into a rolloff, had two rollofs for oil filters delivered, and had one rolloff of used oil filters removed from the site. EPA civil investigator continued to identify and copy manifests associated with drums to be retrieved by the generators, and (with the support of 4 temporary employees) started to sort facility records stored in file boxes by year.

February 2, 2000 (Wednesday)

Personnel on site: 6 START, 11 ERRS, 3 USCG, 2 EPA, 4 Temps
Weather: partially sunny, rain windy high of 45 F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued inventory of RCRA drums, planned Baker Tank sampling with EPA and ERRS. Started sampling Baker Tanks. Began work on the Special Approved Discharge (SAD) application for discharge of treated water to the City of Tacoma Sanitary Sewer. Began preparation for Aboveground Storage Tank sampling. ERRS dumped 48 oil filter drums into rolloff container, emptied and segregated RCRA drums from 1.5 trailers, continued installation of waste water treatment system, and had Waste Management remove two oil filter filled dumpsters. EPA civil investigator continued to support drum retrieval effort and (with the support of 4 temporary employees) began to do a gross sorting of documents within the file boxes.

February 3, 2000 (Thursday)

Personnel on site: 6 START, 11 ERRS, 3 USCG, 1 EPA, 4 Temps
Weather: Clear, light breeze, 40's to high 50's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued Baker Tank sampling, inventory of RCRA waste drums and associated spread sheet entries, continued oversight of on site activities, and continued work on the SAD application. ERRS dumped 45 oil filter drums into a rolloff container, removed additional oil filter drums from trailers and staged them on site, removed and segregated RCRA drums from 2 trailers. Installation of waste water treatment system. Awarded a contract for an excavator to crush empty 55 gallon drums. Additionally, one rolloff container full of used oil filters was removed from the site by Waste Management. EPA civil investigator (with the support of 4 temporary employees) continued working on the Civil Investigation, and locating manifests to support generator retrieval of drums.

February 4, 2000 (Friday)

Personnel on site: 6 START, 11 ERRS, 3 USCG, 2 EPA (CI), 1 Temp

Weather: Clear, light breeze, 40's to high 50's

All site personnel attended daily safety meeting and discussed sit safety and planned activities. START completed Baker Tank sampling, continued inventory of RCRA waste drums and associated data entry, continued oversight of activities on site, and continued working on the SAD application. ERRS dumped 40 oil filter drums into a rolloff container, started crushing empty oil filter drums, and finished segregating RCRA drums from trailers. Construction of treatment system was completed, continued to manage surface water, and removed one rolloff container filled with oil filters. EPA CI reviewed computers on site and (with the assistance of the temporary personnel) began copying documents.

February 5, 2000 (Saturday)

Personnel on site: 1 START, 10 ERRS, 2 USCG

Weather: Partially sunny, high of 45, calm.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START monitored and documented site activities. ERRS crushed approximately 300 empty oil filter drums, treated approximately 10,000 gallons of contact waste water, started sorting RCRA drums in Container Storage area 4B, dumped 155 oil filter drums, segregated 2.5 trailers of RCRA drums, removed one rolloff of used oil filters, and managed site surface water.

2. Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) and the City (City of Tacoma Public Works) continue to provide assistance with discharge of non-contact storm water.

Drums - Oil Filter Drums: This week, six 30-cubic yard rolloffs of used oil filters were removed from the site. A total of nine rolloffs of used oil filters have been removed from the site.

RCRA Drums: Finished segregation of RCRA drums located in trailers. Continued inventory of

RCRA drums. RCRA drums from Building 5 and trailers have been segregated.

Baker Tanks - Baker Tanks filled by CleanCare (prior to EPA involvement with the site) were sampled this week and the contents of one Baker Tank (filled by START & ERRS) were trucked off site for disposal. To date, samples have been collected to characterize all Baker Tanks on site. Depending on analytical results, further characterization of some Baker Tanks may be needed.

Surface Water - This week, constructed a temporary waste water treatment system to treat contact surface water and decontamination water, worked on permit for discharge to the Tacoma Sanitary Sewer. Continued sampling and pumping non contact surface water to the Lincoln Ave. ditch, under agreement with Washington State Department of Ecology.

ASTs - Samples were collected from ASTs T-3, T-4, and T-5. This completes AST sampling in Tank Farm 1. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

START contracted temporary employees have organized the documents assembled in Office Building 1 (estimated to be 1.6 million sheets), and started to photocopy documents specified EPA Civil Investigations.

3.Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. EPA intends to gather additional PRP information during the removal action.

B.Planned Removal Activities

To minimize/eliminate to threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

Drums - organization of drums and documents (manifests & profile analyses), generator notification, hazard

	categorization and disposal tests, and removal of containers from the site. A meeting at CleanCare is scheduled for February 22, 2000. At this meeting generators with wastes stored in drums/containers will have the opportunity to identify their wastes and schedule a time to remove their waste from the site.
Baker Tanks -	sampling, handling of contents, cleaning tanks, and removal of tanks from the site. The water from some tanks will be treated on site and discharged. At the same time, water from other Baker Tanks will be shipped off site.
Surface Water -	manage surface water as it collects onsite (including sampling, treatment, and discharge), clean concrete and asphalt surfaces that currently impact surface water, establish and implement a long term. plan/recommendation for surface water management including possibly construction of an asphalt cap.
ASTs -	sampling, handling of contents (off site disposal or combination of onsite treatment and off site disposal anticipated), clean tanks, possible dismantling of some tanks and containment structures and remove from site
Soil -	Possible further sampling prior to excavation, confirmation sampling, and removal from site or onsite treatment. Installation of asphalt cap if deemed necessary.

C.Next Steps

EPA, ERRS, START, and the USCG Strike Team to continue managing onsite surface water. Complete the segregation and inventory of RCRA drums, locate and file the manifests for the RCRA drums, and prepare for generator recovery of waste drums. Treat some Baker Tank water, ship some of it off site. Complete the Special Approved Discharge (SAD) application & obtain discharge permit from the City of Tacoma. Discharge treated water to the Tacoma Sanitary Sewer, in accordance with the SAD. Decontaminate some tanks and return them to Baker Tanks.

D.Key Issues

Security Off Duty City of Tacoma Police continue with site security.

Discharge of non contact waters Noncontact surface water is being discharged to the Lincoln Avenue Ditch, as needed, with daily permission of the Washington State Department of Ecology (DOE). Discharge requirements established by DOE are being followed.

Management of contact water; Contact surface water (that which falls within the secondary containment structures) is being pumped into temporary

storage tanks (Baker Tanks). Some of this water has been analyzed, and the treatment/disposal options have been evaluated. The water from some tanks will be treated on site and discharged. At the same time, water from other Baker Tanks will be shipped off site. Performing both tasks simultaneously will reduce the length of time required to accomplish this task, reduce the associated costs, such as Baker Tank rental fees, and remove the threat of a release.

Drum/Container Waste; Generators of site waste stored in drums/containers will have the opportunity dispose of their wastes. This process will include a meeting on site February 22, 2000.

V. Cost Information

Estimated costs are summarized below

	Established Ceiling	Estimated Costs (as of 2/5/00)
EPA	\$ 150,000	\$ 9,320
START	\$ 350,000	\$ 46,174
ERRS	\$ 1,100,000	\$ 389,968
Coast Guard	\$ 100,000	\$ 20,780
Total	\$ 1,700,000	\$ 466,241

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
used oil filters	solid and solidified waste	270 cu yd	placed liners in rolloffs	removed oil filters from 55 gallon drums and consolidated in rolloffs	Waste Management delivered to Olympic View Sanitary Landfill

oily debris	solidified waste	20 cu yd	placed liners in rollofs	consolidated in rollofs	Phillips Environmental delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	19,300 gal	contained in Baker Tank	Emerald Petroleum Services-s (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer

Used oil filters are being removed from site to free up room to stage, sort, and segregate the large volume of drums on site. The drums containing the filters were located in building 5, inside of on-site tractor trailer trucks, and co-mingled with regulated wastes.

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby
EPA Region 10, Emergency Response Unit, Attention: Chris Field
EPA Washington Operations Office, Attention: Julie Hagensen
Washington State Department of Ecology, Attention: Jim Sachet
City of Tacoma Public Works Department, Attention: Michael Kennedy
EPA Region 10 Web page, Attention: Beth Kunz
EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending.